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15 Attorneys for Plaintiff
GWENDOLYN R. SAMPSON-BROWN

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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19

20 GWENDOLYN R. SAMPSON-BROWN,

Case No. 4:20-cv-01331-HSG

21 Plaintiff,

22
STIPULATION AND ORDER RE:
FEDERAL RULE OF EVIDENCE
502(D)

23 v.
24 FRESENIUS MANAGEMENT SERVICES,
INC. and DOES 1 through 20, inclusive.

State Complaint Filed: 10/11/19
Trial Date: Not Set

25
26 Defendants.
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The Parties hereby enter into the following stipulation regarding the production of privileged or work-product protected documents as follows:

Plaintiffs and Defendant stipulate, through their counsel of record, that the unintentional or intentional production of privileged or work-product protected documents, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

MARTIN & VANEGAS, APC

DATED: March 27, 2020

By: *Brockway's Sons*

John F. Martin
Marta R. Vanegas
Brittany C. Jones
Attorneys for Plaintiff
Gwendolyn R. Sampson-Brown

DATED: March 24, 2020

JACKSON LEWIS P.C.

SM

By:

Lisa Barnett Sween
Spencer Davidson
Attorneys for Defendant
Fresenius Management Services, Inc d/b/a
Fresenius Medical Care North America

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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2 DATED: 3/25/2020
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Honorable Haywood S. Gilliam, Jr.
United States District Court Judge